

CHARLES T. WINGO

Campaign Finance Commission

AUG 01 2018

July 24, 2018

Post-Marked Date
26 July 2018
2018 - 0104
Stacey Abrams &
Stacey Abrams for Gov.

6125 Rivercliff Dr.
Sandy Springs, GA 30318-3710

Georgia Government Transparency and Campaign Finance Commission
200 Piedmont Ave. SE, Ste. 1416 West Tower
Atlanta, GA 30334

Re: Campaign Finance Law Complaint

To Whom It May Concern:

Complainant, Charles T. Wingo, brings this formal complaint pursuant to Section 21-5-7 of the Official Code of Georgia Annotated ("O.C.G.A.") against Respondents Ms. Stacey Abrams, Stacey Abrams for Governor, Ms. Emily Ellison in her official capacity as Treasurer of Stacey Abrams for Governor, BLUE Institute Enterprises, Inc., Ms. Ashley Robinson in her official capacity of BLUE Institute Enterprises, Inc., and Ms. Genny Castillo in her official capacity of BLUE Enterprises, Inc. (collectively "Respondents") upon information and belief that Respondents violated the Georgia Government Transparency and Campaign Finance Act, as follows.

I. Parties

Complainant, Charles T. Wingo,

Respondent Stacey Abrams ("Abrams") is a registered candidate for the office of Governor with the Georgia Government Transparency and Campaign Finance Commission (the "Commission") and resides at 1912 Hosea Williams Drive #6, Atlanta, GA 30317.

Respondent Stacey Abrams for Governor (the "Campaign") is Abrams' registered candidate committee with the Commission and maintains an office at 1270 Caroline St. Suite D120-447, Atlanta, GA 30307.

Respondent Ms. Emily Ellison ("Treasurer") serves in an official capacity as the Campaign's Treasurer. Ellison maintains an address at 1270 Caroline St. Suite D120-447, Atlanta, GA 30307.

Respondent BLUE Institute Enterprises, Inc. ("BLUE Institute Enterprises") is registered as a Georgia nonprofit corporation and maintains an address at 880 Glenwood Ave. SE, Unit 3351, Atlanta, GA 30316. BLUE Institute Enterprises is also registered as a political action committee with the Commission.

Respondent Ms. Ashley Robinson ("Robinson") serves as the registered agent of BLUE Institute Enterprises. Robinson maintains an address at 880 Glenwood Ave. SE, Unit 3351, Atlanta, GA 30316.

Respondent Ms. Genny Castillo (“Castillo”) serves as the Treasurer of BLUE Institute Enterprises, Inc. Robinson maintains an address at 2700 Pine Tree Rd., NE Unit 2305, Atlanta, GA 30324 VI.

II. Factual Allegations

On May 2, 2017, Abrams, along with her Treasurer, registered her Campaign with the Commission by filing a Registration Form and Declaration of Intention to Accept Campaign Contributions, officially entering the race as a Democratic gubernatorial candidate.¹

On February 22, 2018, BLUE Institute Enterprises registered as a Georgia nonprofit corporation with the subcode “political organization.”² Its Articles of Incorporation list Robinson as its current Registered Agent, sole incorporator, President, and Treasurer.³ It also lists Castillo as its Vice President and Secretary.⁴ BLUE Institute Enterprises also lists Robinson as its Principal and Castillo as its COO.⁵

BLUE Institute Enterprises’ Articles of Incorporation also state its mission is: “*to directly or indirectly accept contributions or make expenditures for the purpose of promoting the support of training and recruitment of people into electoral campaigns, promoting the nomination of an individual for an elective public office, and to engage in any lawful act or activities related to the foregoing that are consistent with the provisions of section 527 of the Code.*”⁶

One of BLUE Institute Enterprises’ goals is to recruit, train, and place activists “ready to lead aggressive and inclusive issue and electoral campaigns across local, state, and national races.”⁷

On February 26, 2018, Blue Institute Enterprises registered with the Commission as a political action committee (the “PAC”).⁸ The Commission’s website indicates that Robinson serves as the PAC’s Chairperson and Castillo serves as the PAC’s Treasurer.⁹

On BLUE Institute Enterprises’ website, BLUE Institute Enterprises disclaims and attempts to solicit funds directly to its PAC, providing that a contributor may either mail in its contribution or give online.¹⁰

On or about April 10, 2018, the Campaign launched a coalition entitled “1881 for Abrams.” This coalition was designed to organize Spelman College alumna and student supporters, with a goal in mind

¹ See Exhibit A.

² BLUE Institute Enterprises claims to be a political organization, but it appears upon information and belief that it has not filed the proper paperwork with the Internal Revenue Service; see Exhibit B.

³ See Exhibit C.

⁴ *Id.*

⁵ See <https://www.theblue.institute/copy-of-about-us>.

⁶ *Id.*

⁷ BLUE Institute, *Our Processes*, <https://www.theblue.institute/> (last visited June 19, 2018).

⁸ See Exhibit D.

⁹ *Id.*

¹⁰ See <https://www.theblue.institute/donate>; see also <https://secure.actblue.com/donate/blue-institute>.

of “making Stacey Abrams the 83rd Governor of Georgia.”¹¹ The Campaign indicated a person may become a coalition member by 1.) *raising a specified amount of contributions or garner in-kind contributions*, 2.) participating in at least two days of voter engagement, and 3.) engage in social media promotion.¹²

Notably, the Campaign identified a management structure, indicating Robinson, a “campaign staffer,” would lead the Committee’s coalition.¹³ The Campaign also provided Robinson’s official campaign email information.

In a Campaign Contribution Disclosure Report (“CCDR”) filed on March 31, 2018, the Campaign reported expenditures in the amounts of \$1,666.67 and \$1,721.92 for “Payroll Salaries” to Castillo and Robinson, respectively.¹⁴ This report further shows Castillo and Robinson were also paid employees of the Abrams campaign, in addition to their roles with BLUE Institute Enterprises and its PAC.

The Campaign also reported an expenditure to Robinson in the amount of \$90.90 for “Reimbursement - Mileage.”¹⁵

As of the date of this Complaint, a public search reveals the PAC has not filed any disclosure reports with the Commission.¹⁶

III. Allegations

A. Coordination

The establishment of BLUE Institute Enterprises and its PAC by Robinson and Castillo, who are also agents of the Campaign, constitutes a per se form of unlawful coordination with the Campaign under Georgia campaign finance law.

Georgia’s coordination standard is not statutorily defined, but comes instead from understanding the definitions of “contribution” and “independent expenditure.” Georgia defines “contribution” to mean:

“gift, subscription, membership, loan, forgiveness of debt, advance or deposit of money *or anything of value conveyed or transferred for the purpose of influencing the nomination for election or election of any person for office*[.]”¹⁷

¹¹ See Exhibit E.

¹² *Id.*

¹³ *Id.*

¹⁴ See Exhibit F.

¹⁵ *Id.*

¹⁶ See Exhibit G.

The Georgia Government Transparency and Campaign Finance Act (the “Act”) recognizes that a contribution may be not just money, but “anything of value conveyed or transferred for the purpose of influencing the nomination for election or election of any person for office[.]”¹⁸ Otherwise, the statute is silent on what constitutes a thing of value is, or how it may be deemed “conveyed or transferred.”

Through regulation and advisory opinion, the Commission has shed more light on when communications and other activity constitute an improper in-kind contribution to a candidate. In a regulation addressing the reporting of contributions and expenditures, the Commission has stated:

This is fairly common language incorporating a fairly common standard found at the federal level and in m[A]n expenditure is independent only if it meets certain conditions. *It must not be made with the cooperation or consent of, or in consultation with, or at the request or suggestion of any candidate or any of his or her agents or authorized committees.*¹⁹

ost states. *A third party’s expenditure is deemed to be coordinated* – and thus counts as a contribution, against the applicable limit – *if a candidate, campaign or agent of either requested or suggested that the third party make the expenditure, or if a candidate, campaign or agent of either cooperated or consulted with the third party in its making the expenditure, or consented to it.* A federal court interpreted similar language at the federal level to mean that such “consultation” means consultation between a candidate/campaign/agent and a third party “*regarding the content, timing, place, nature or volume of the communication for which the expenditure is made,*”²⁰ and several jurisdictions have adopted this interpretation.

Recently, in Advisory Opinion 2017-05, the Commission further elaborated on what may constitute an in-kind contribution to a candidate. Notably, the Commission held that “[i]f a candidate attempts to establish or obtain funding for [an] “independent committee” . . . then the establishment of the committee by the candidate is per se a form of coordination with the committee. . . . [Such expenditures] would per se be made with the cooperation or consent of, or in consultation with, or at the request or suggestion of any candidate or any of his or her agents or authorized committees.”²¹

In addition, the opinion said “*the establishment of*” (not mere solicitation for) an outside group is what *would* constitute coordination; but elsewhere the opinion said “[t]he only lawful way a candidate may solicit contributions during a campaign to support the candidate’s election is by and for the candidate or the candidate’s campaign committee.”²² The latter cannot be literally true, or otherwise it would have the effect of prohibiting a candidate from soliciting for the state party, which cannot have been the intent.

¹⁷ O.C.G.A. § 21-5-3(7) (emphasis added).

¹⁸ O.C.G.A. § 21-5-3(7). This is important because “[w]hen a person pays for or provides . . . anything of value on behalf of a candidate or a campaign committee for the purpose of influencing an election, it is a ‘contribution’ and is subject to the contribution limits[.]” Rules of the Ga. Govt. Transparency & Campaign Finance Comm’n, Rule 189-3-.02.

¹⁹ Ga. Comp. R. & Regs. 189-3-.01(f) (emphasis added).

²⁰ *Federal Election Commission v. Christian Coalition*, 52 F. Supp. 2d 45, 92 (D.D.C. 1999) (emphasis added).

²¹ *Id.* at 10 (italics added, other emphasis original (internal quotation, citation omitted)).

²² *Id.* at 8 (internal citation omitted).

This insinuates that *a candidate, campaign, or agent should not establish or solicit for an outside group whose sole purpose is to assist the candidate's election.*²³

In light of the Commission's recent holdings, Respondents' activity constitutes a *per se* form of coordination in two ways. First, Robinson and Castillo, even though they served as agents of the Campaign, attempted to solicit contributions to BLUE Institute Enterprises and its PAC, as discussed above. Even more, Robinson simultaneously was responsible for one of the Campaign's coalition which sought to solicit contributions to the Campaign, as discussed above.²⁴

Second, as employees of the Campaign, Robinson and Castillo established BLUE Institute Enterprises and its PAC, both of which were organized to promote Abrams' election, *after* Abrams began campaigning. As set forth in the Commission's opinion, the establishment alone, not just the mere solicitation, by Robinson and Castillo alone is *per se* a separate form of coordination.

Moreover, any expenditure made by BLUE Institute Enterprises or its PAC would be deemed *per se* coordinated expenditures, and in turn improper, unreported in-kind contributions to the Campaign, because the expenditures would be made with the consent of and consultation with the Campaign's agents – Robinson and Castillo.

B. Failure to File Campaign Finance Disclosure Reports

As a registered political action committee, the PAC, through either Robinson or Castillo, failed to file required campaign finance reports with the Commission pursuant to O.C.G.A. § 21-5-34.²⁵ Because political action committees, by definition, contribute to one or more candidates, Georgia subjects political action committees to registration and disclosure requirements, as well as contribution limits under the Act.²⁶

Specifically, Georgia requires the Chairperson or Treasurer of any committee which accepts contributions or expenditures to timely file CCDRs with the Commission as delineated under O.C.G.A. § 21-5-34(g). For the 2018 election cycle, Georgia requires a political action committee to file CCDRs on the following dates:

- February 7, 2018;
- April 6, 2018;

²³ The Commission recognized this *per se* form of coordination may exist regardless of whether the entity was established as an independent committee initially or under any federal tax status. *Id.*

²⁴ See Exhibit E.

²⁵ "Political action committee" means "[a]ny committee, club, association, partnership, corporation, labor union, or other group of persons which receives donations during a calendar year from persons who are members or supporters of the committee and which contributes funds to one or more candidates for public office...Such term does not include a candidate committee." O.C.G.A. § 21-3-5(20).

²⁶ The Supreme Court has stated the disclosure requirements serve to provide voters with information as to where political money is coming from and "the interests to which a candidate is most likely to be responsive." *Buckley v. Valeo*, 424 U.S. 1, 658 (1976).

- July 9, 2018;
- October 5, 2018;
- November 1, 2018; and
- January 2019.²⁷

These reports must disclose the certain information relating to each contribution and expenditure.²⁸

Although the PAC complied with Georgia's registration requirements, the PAC has failed to comply with Georgia's reporting requirements. The PAC, through either Robinson or Castillo, should have, but failed to, file a CCDR on April 6, 2018 disclosing contributions and expenditures for the applicable reporting period.

IV. Prayer for Relief

For the reasons above, Complainant respectfully requests the Commission to initiate an investigation and conduct a preliminary hearing into the Respondents' aforementioned violations of O.C.G.A. § 21-5-30, whereupon, finding such reasonable grounds exist to believe a violation has occurred, deem this a contested case, conduct a final hearing, find Respondents guilty of a misdemeanor and order Respondents to pay the maximum amount of penalties pursuant to O.C.G.A. §21-5-6(14)(C)(i).

Respectfully Submitted,

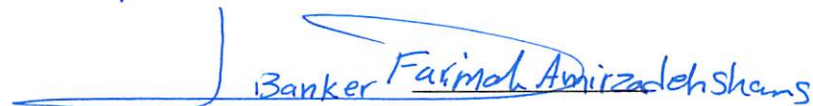


Charles T. Wingo
6125 Rivercliffe Dr.
Sandy Springs, GA 30328-3710
Charles_Wingo@msn.com

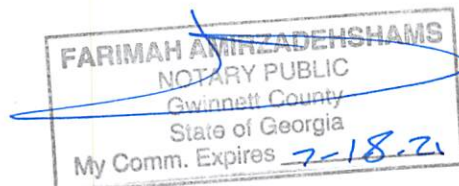
State: Georgia

Signed and sworn to (or affirmed) before me on 26 July 2018 (date) by _____

Charles T. Wingo



Signature, Title, Rank of Notorial Officer



My Commission Expires:

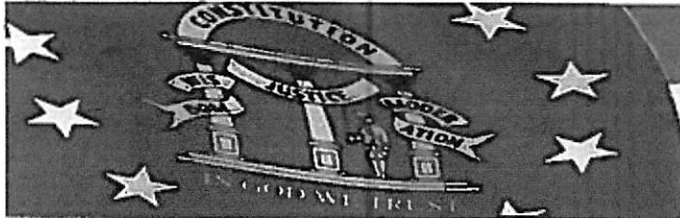
7-18-2021

²⁷ See

http://media.ethics.ga.gov/schedules/ScheduleInformation.aspx?CommitteeType=NONC&ReportYear=2018&ReportType=Election%20Year&Report_Election=0.

²⁸ O.C.G.A. § 21-5-34(b).

EXHIBIT A



GEORGIA GOVERNMENT TRANSPARENCY AND CAMPAIGN FINANCE COMMISSION

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CAMPAIGN REPORTS AND REGISTRATION INFORMATION

Candidate Name: Abrams, Stacey Yvonne

FilerID	Office Sought	Candidate Information	Status
C2017000285	Governor	Click Here To View	Active
C2006000221	State Representative District: 89	Click Here To View	Active

[Campaign Disclosure Reports](#) [Registration Information](#)

CAMPAIGN REGISTRATION INFORMATION

CANDIDATE INFORMATION

C2017000285
 Abrams, Stacey Yvonne
 1912 Hosea Williams Drive # 6
 Atlanta GA 30317
 (678) 781 - 7654
 Democratic
 Governor

COMMITTEE INFORMATION

Stacy Abrams for Governor
 1270 Caroline Street, Suite D120-447
 Atlanta, GA 30307

CHAIRPERSON INFORMATION

Allegra Lawrence-Hardy
 1270 Caroline Street, Suite D120-447
 Atlanta, GA 30307

TREASURER INFORMATION

Emily Ellison
 1270 Caroline Street, Suite D120-447
 Atlanta, GA 30307

TYPE	DATE RECEIVED	HAND DELIVERED	POSTMARK	BAD POSTMARK
DOI FILED	05/02/2017	Yes	05/02/2017	NO
RC FILED	05/02/2017	Yes	05/02/2017	
COOSA	05/02/2017	Hand Delivered	05/02/2017	Bad Postmark

EXHIBIT B



Basic Search Advanced Search Popular Search

Based on your Search Criteria of:

Searching for: Form 8871, Form 8872, Form 990
Name of organization: BLUE Institute Enterprises, Inc.

...no results found

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EXHIBIT C



GEORGIA CORPORATIONS DIVISION

GEORGIA SECRETARY OF STATE
BRIAN P. KEMP

[HOME \(/\)](#)

BUSINESS SEARCH

BUSINESS INFORMATION

Business Name:	BLUE Institute Enterprises, Inc.	Control Number:	18021988
Business Type:	Domestic Nonprofit Corporation	Business Status:	Active/Compliance
NAICS Code:	Other Services (except Public Administration)	NAICS Sub Code:	Political Organizations
Principal Office Address:	880 Glenwood Ave SE, Unit 3351, Atlanta, GA, 30316, USA	Date of Formation / Registration Date:	2/22/2018
State of Formation:	Georgia	Last Annual Registration Year:	NONE

REGISTERED AGENT INFORMATION

Registered Agent Name: **Ashley Robinson**
Physical Address: **880 Glenwood Ave SE, Unit 3351, Atlanta, GA, 30316, USA**
County: **Fulton**

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ARTICLES OF INCORPORATION

Electronically Filed
Secretary of State
Filing Date: 1/25/2018 11:14:40 AM

BUSINESS INFORMATION

CONTROL NUMBER 18021988
BUSINESS NAME BLUE Institute Enterprises, Inc.
BUSINESS TYPE Domestic Nonprofit Corporation
EFFECTIVE DATE 02/22/2018

The corporation is organized pursuant to the Georgia Nonprofit Corporation Code.

PRINCIPAL OFFICE ADDRESS

ADDRESS 880 Glenwood Ave SE, Unit 3351, Atlanta, GA, 30316, USA

REGISTERED AGENT'S NAME AND ADDRESS

NAME	ADDRESS
Ashley Robinson	880 Glenwood Ave SE, Unit 3351, Fulton, Atlanta, GA, 30316, USA

INCORPORATOR(S)

NAME	TITLE	ADDRESS
Ashley Robinson	INCORPORATOR	880 Glenwood Ave SE, Unit 3351, Atlanta, GA, 30316, USA

MEMBER INFORMATION

The corporation will not have members.

OPTIONAL PROVISIONS

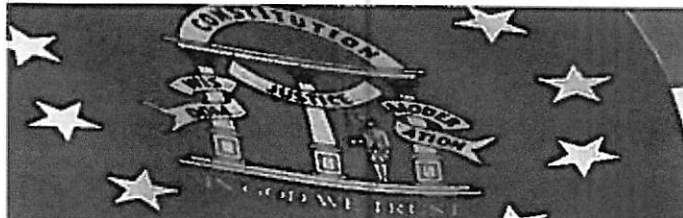
ARTICLES OF INCORPORATION OF BLUE INSTITUTE ENTERPRISES, INC. (A Georgia Nonprofit Corporation) I. The Corporation shall have perpetual duration. II. A. The Corporation is a nonprofit corporation organized for the following political activity purposes within the meaning of section 527 of the Internal Revenue Code of 1986, as amended, or the corresponding provision of any future United States internal revenue law (referred to in these Articles of Incorporation as the "Code"): To directly or indirectly accept contributions or make expenditures for the purpose of promoting the support of training and recruitment of people into electoral campaigns, promoting the nomination of an individual for an elective public office, and to engage in any lawful act or activities related to the foregoing that are consistent with the provisions of section 527 of the Code. B. The Corporation is not organized and shall not be operated for pecuniary gain or profit. No part of the property or net earnings of the Corporation shall inure to the benefit of any individual, except as reasonable compensation for services actually rendered by such individual or as payments and distributions in furtherance of the purposes set forth in this Article IV. It is intended that the Corporation will qualify at all times as an organization exempt from federal income tax under sections 527 of the Code; therefore, notwithstanding any other provision in these Articles, the Corporation shall never be authorized to engage in any activity except in furtherance of the purposes for which the Corporation is organized, and the Corporation shall not carry on any activities not permitted to be carried on (i) by a corporation exempt from federal income tax under section 527 of the Code. C. The Corporation shall operate exclusively for exempt functions, where "exempt function" means the function of influencing or attempting to influence the selection, nomination, election, or appointment of any individual to any Federal, State, or local public office or office in a political organization, or the election of Presidential or Vice-Presidential electors, whether or not such individual or electors are selected, nominated, elected, or appointed. Such term includes the making of expenditures relating to an office described in the preceding sentence which, if incurred by the individual, would be allowable as a deduction under section 162(a) of the Code. III. Unless otherwise provided in these Articles of Incorporation, the Corporation shall have all of the powers conferred upon nonprofit corporations under the Georgia Nonprofit Corporation Code, to be exercised solely in furtherance of the purposes described in Article IV hereof. The Corporation shall have the power and authority to accept gifts and contributions, whether made by will or otherwise, in any form of property, but only if the objects specified by the testator or donor are within the objects and purposes of the Corporation and in accordance with the terms and conditions of Treas. Reg. 1-

527-2, et. seq. IV. The affairs of the Corporation shall be managed by a Board of Directors consisting of at least 2 and no more than 7 members. The exact number and the method of election of the members of the Board of Directors, as well as any qualifications for being a member of the Board of Directors, shall be as provided from time to time by or pursuant to the Bylaws of the Corporation, except that the number of the members of the initial Board of Directors is fixed by Article IX of these Articles of Incorporation. V. The initial Board of Directors of the Corporation shall consist of three members, each of whom shall serve until the first annual meeting of the Corporation, and whose Names, offices and addresses are as follows: Ashley Robinson, President and Treasurer 880 Glenwood Ave, SE Unit 3351 Atlanta, GA 30316 Genny Castillo, Vice President and Secretary 2700 Pine Tree Rd, NE Unit 2305 Atlanta, GA 30324 VI. No director of the Corporation shall be personally liable to the Corporation for monetary damages for breach of his or her duty of care or other duty as a director; provided, that this provision shall eliminate or limit the liability of a director only to the extent permitted from time to time by the Georgia Nonprofit Corporation Act or any successor law or laws. VII. The address of the initial registered and principal office of the Corporation is 880 Glenwood Avenue, SE, Unit 3351, Atlanta, GA 30316 and the initial registered agent of the Corporation at such address is Ashley Robinson. VIII. The name and address of the incorporator are: Ashley Robinson 880 Glenwood Ave, SE Unit 3351 Atlanta, GA 30316 IX. The Articles of Incorporation of the Corporation may be amended by the affirmative vote of two-thirds of the Directors of the Corporation then in office as permitted in the Georgia Nonprofit Corporation Code (or the corresponding provision of any future Georgia nonprofit corporation law); provided, however, that no amendment may be made which would cause the Corporation no longer be qualified as an exempt organization described in section 527 of the Code.

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE	Ashley Robinson
AUTHORIZER TITLE	Incorporator

EXHIBIT D



GEORGIA GOVERNMENT TRANSPARENCY AND CAMPAIGN FINANCE COMMISSION

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CAMPAIGN REPORTS AND REGISTRATION INFORMATION

Committee Name: BLUE Institute Enterprises, Inc.

Committee Type	View Reports and Registration Information
Political Action Committee	Click Here To View

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CAMPAIGN REGISTRATION INFORMATION

COMMITTEE INFORMATION

NC2018000007
 BLUE Institute Enterprises, Inc.
 245 N. Highland Ave. NE Suite 230-526
 Atlanta, GA 30307
 (678) 464 - 3321

COMMITTEE TYPE

Political Action Committee

CHAIRPERSON INFORMATION

Ashley Robinson
 245 N. Highland Ave., NE Suite 230-526
 Atlanta, GA 30307

TREASURER INFORMATION

Genny Castillo
 245 N. Highland Ave., NE Suite 230-526
 Atlanta, GA 30307

REGISTRATION INFORMATION

Registration Year	Date On Registration	Postmark
2018	2/26/2018	N/A

EXHIBIT E



Purpose:

1881 for Stacey Abrams is a coalition designed to harness the energy, excitement, and commitment that has been demonstrated since the beginning of Stacey Abrams for Governor campaign by the distinguished women of Spelman College, Stacey Abrams' alma mater. Spelman women were the first to volunteer, display yard signs, and make contributions in support of our campaign. This support is an extension of the national wave of Black women activism and political leadership that has bolstered the election of candidates that embody their values.

The 1881 for Stacey Abrams coalition will organize alumna and student supporters to amplify our candidate and campaign by engaging in three pillars: Fundraising, Voter Contact, and Visibility. The goal of this coalition is to ensure that every Spelman sister is engaged in making Stacey Abrams the 83rd Governor of Georgia.

Coalition Requirements:

To become a member of '1881 for Stacey Abrams' you must:

1. **Fundraise:** Help us reach our one-million-dollar fundraising goal for Spelman women giving and raising by joining a fundraising circle here:
<https://secure.actblue.com/donate/1881forAbrams>
 - a. **Sister Circle:** Contribute a minimum of \$18.81 to the Stacey Abrams campaign; if able, set up a recurring monthly contribution of \$18.81 for the duration of the campaign.
 - b. **True Blue Circle:** Contribute a minimum of \$188.10 to the Stacey Abrams campaign; if preferred, set up a recurring monthly contribution to contribute a total of \$188.10 by November 1 or set up a recurring monthly contribution of \$188.10 for the duration of the campaign.
 - c. **Change-maker Circle:** Contribute or raise a minimum of \$1,881 to the Stacey Abrams campaign; if preferred, set up a recurring monthly contribution to contribute a total of \$1,881 by November 1 or set up a recurring monthly contribution of \$1,881 for the duration of the campaign.
 - **Monetary Contributions** - Contribute and encourage others to do so; (co)host a fundraiser for the campaign.
 - **In-Kind Contributions** – Contribute meeting space, skills and talents, food, water, transportation, cell phones, and poster making supplies to the campaign.

2. **Voter Engagement:** Participate in at least two Days of Action over the course of the campaign. There will be special "1881" events, however, members are encouraged to engage with any and all campaign activities that fit their schedule. Those who are interested in continuing or expanding voter contact may become volunteer captains and organize canvassing and phone banking initiatives for the campaign nationwide.
 - **Voter Contact-** Phone banking, text messaging, canvassing, postcard writing to friends and family.
 - **Events Hosting/Management** - Host an engagement event at home or in the neighborhood, engage social/community affiliated organizations and networks.
 - **Recruitment/Outreach** - Have a signup form for friends (social networking), practice social mapping of their friends and possible supporters.
3. **Visibility:** Members can become a 'Digital Ambassador' by re-posting articles, re-tweeting or sharing statuses on your social media platforms from Stacey Abrams and the campaign. They may also become surrogates for the campaign which includes to attending community events, hosting gatherings, and speaking on behalf of the campaign, as coordinated by the campaign team, to ensure that we have a strong presence across Georgia and beyond.
 - **Social Media Communication-** Create and share digital content, participate in digital campaigns and contests.
 - **Innovative Participation** - Apply your talents and skills to the program to promote the campaign's outreach goals.

Relationship to 1000 Women Strong

All members of 1881 for Abrams will automatically become members of our all-encompassing women's coalition, 1000 Women Strong for Stacey Abrams. They will receive all correspondence and alerts pertaining to events for 1000 Women Strong where they can engage family, friends, and colleagues that may not be members of 1881 for Abrams.

Management Structure: This coalition will be led by Spelman alumna and campaign staffer Ashley Robinson- ashley@staceyabrams.com.

EXHIBIT F



GEORGIA GOVERNMENT TRANSPARENCY AND CAMPAIGN FINANCE COMMISSION

Formerly known as the State Ethics Commission

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CAMPAIGN CONTRIBUTION DISCLOSURE REPORT - EXPENDITURES

Search Other Reports

Business Transaction Reports
Campaign Reports
Personal Financial Reports & Affidavits
Lobbyist Reports
Late/Non-File Reports
Vendor Gifts Reports
CFC Main Search

Name: Abrams, Stacey Yvonne
FilerID: C2017000285
Year: 2018
Report: March 31st - Election Year

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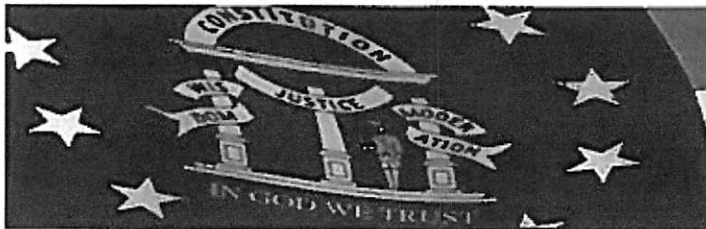
[CFC Home Page](#)

Recipient	Date / Type	Occupation and Employer	Purpose	In-Kind Amount	Cash Amount
Sinclair Reginald R. Abraham 1396 Essex Dr Atlanta, SC 99999	02/28/2018 Expenditure	Statewide Political Director	Payroll Salaries	\$0.00	\$2,991.71
Sinclair Reginald R. Abraham 1396 Essex Dr Atlanta, SC 99999	03/31/2018 Expenditure	Statewide Political Director	Payroll Salaries	\$0.00	\$2,991.73
Stacey Y. Abrams 1912 Hosea L Williams Dr NE Atlanta, GA 30317-2268	02/05/2018 Loan Repayment	Candidate	Loan repayment	\$0.00	\$10,000.00
Stacey Y. Abrams 1912 Hosea L Williams Dr NE Atlanta, GA 30317-2268	03/06/2018 Loan Repayment	Candidate	Loan Repayment	\$0.00	\$5,000.00
Accident Fund Insurance PO Box 77000 Detroit, MI 48277-2000	03/05/2018 Expenditure		Insurance	\$0.00	\$779.00
ActBlue 366 Summer St Somerville, MA 02144-3132	02/01/2018 Expenditure		Contribution Processing Fees	\$0.00	\$180.40
ActBlue 366 Summer St Somerville, MA 02144-3132	02/02/2018 Expenditure		Contribution Processing Fees	\$0.00	\$114.52
ActBlue 366 Summer St Somerville, MA 02144-3132	02/03/2018 Expenditure		Contribution Processing Fees	\$0.00	\$50.29
ActBlue 366 Summer St Somerville, MA 02144-3132	02/04/2018 Expenditure		Contribution Processing Fees	\$0.00	\$57.67
ActBlue 366 Summer St Somerville, MA 02144-3132	02/05/2018 Expenditure		Contribution Processing Fees	\$0.00	\$30.45
ActBlue 366 Summer St Somerville, MA 02144-3132	02/06/2018 Expenditure		Contribution Processing Fees	\$0.00	\$45.62
ActBlue 366 Summer St Somerville, MA 02144-3132	02/07/2018 Expenditure		Contribution Processing Fees	\$0.00	\$49.63
ActBlue 366 Summer St Somerville, MA 02144-3132	02/08/2018 Expenditure		Contribution Processing Fees	\$0.00	\$49.36
ActBlue 366 Summer St Somerville, MA 02144-3132	02/09/2018 Expenditure		Contribution Processing Fees	\$0.00	\$245.04
ActBlue	02/10/2018		Contribution	\$0.00	\$43.19

1016 Plantation Way NW Kennesaw, GA 30144-1890	Expenditure				
Caleb J. Celeste 37 Rockingwood Vw Dallas, GA 30157-1676	03/31/2018 Expenditure	Field Organizer & Advance	Payroll Salaries	\$0.00	\$2,393.70
Genny Castilo 2700 Pine Tree Rd NE Atlanta, GA 30324-5676	03/31/2018 Expenditure	Director of Constituent Services	Payroll Salaries	\$0.00	\$1,666.67
Caleb Celeste 1016 Plantation Way NW Kennesaw, GA 30144-1890	02/05/2018 Expenditure	Field Organizer & Advance	Reimbursement - Mileage	\$0.00	\$336.49
Shakya Cherry-Donaldson 5001 Treecrest Pkwy Decatur, GA 30035-3551	02/05/2018 Expenditure	Deputy Field Director	Reimbursement - Mileage	\$0.00	\$395.69
Shakya Cherry-Donaldson 5001 Treecrest Pkwy Decatur, GA 30035-3551	02/28/2018 Expenditure	Deputy Field Director	Payroll Salaries	\$0.00	\$3,005.21
Shakya Cherry-Donaldson 5001 Treecrest Pkwy Decatur, GA 30035-3551	03/31/2018 Expenditure	Deputy Field Director	Payroll Salaries	\$0.00	\$3,005.23
Cincinnati Insurance Company PO Box 145620 Cincinnati, OH 99999	03/05/2018 Expenditure		Insurance	\$0.00	\$971.00
City of Atlanta-Department Watershed Management 55 Trinity Ave SW Atlanta, GA 30303-3520	02/20/2018 Expenditure		Utilities	\$0.00	\$88.04
City of Atlanta-Department Watershed Management 55 Trinity Ave SW Atlanta, GA 30303-3520	03/21/2018 Expenditure		Utilities	\$0.00	\$88.04
Civis Analytics, Inc. 220 W Monroe St Chicago, IL 60606-5002	02/05/2018 Expenditure		Data Services	\$0.00	\$6,000.00
Comcast Business 1701 John F Kennedy Blvd Philadelphia, PA 19103-2833	02/20/2018 Expenditure		Internet	\$0.00	\$293.71
Comcast Business 1701 John F Kennedy Blvd Philadelphia, PA 19103-2833	03/23/2018 Expenditure		Internet	\$0.00	\$293.71
Commerce Club 191 Peachtree St NE Atlanta, GA 30303-1740	02/19/2018 Expenditure		Meetings/Events - Food/Beverage	\$0.00	\$562.00
Brenda Cornelius 3808 Cherry Ridge Blvd Decatur, GA 30034-5050	02/28/2018 Expenditure	Political Director	Payroll Salaries	\$0.00	\$4,062.37
Brenda Cornelius 3808 Cherry Ridge Blvd Decatur, GA 30034-5050	03/31/2018 Expenditure	Political Director	Payroll Salaries	\$0.00	\$4,062.37
COSTCO Wholesale 3980 Venture Dr Duluth, GA 30096-5077	02/15/2018 Expenditure		Office Supplies	\$0.00	\$112.15
COSTCO Wholesale 3980 Venture Dr Duluth, GA 30096-5077	02/15/2018 Expenditure		Office Supplies	\$0.00	\$150.23
COSTCO Wholesale 3980 Venture Dr Duluth, GA 30096-5077	02/15/2018 Expenditure		Office Supplies	\$0.00	\$329.50
COSTCO Wholesale 3980 Venture Dr Duluth, GA 30096-5077	02/15/2018 Expenditure		Office Supplies	\$0.00	\$21.67
COSTCO Wholesale 3980 Venture Dr Duluth, GA 30096-5077	03/19/2018 Expenditure		Event Supplies	\$0.00	\$1,478.63
Cricket Wireless 21 Peachtree St SW Atlanta, GA 30303-3140	02/20/2018 Expenditure		Telephone Services	\$0.00	\$235.00
Cricket Wireless 21 Peachtree St SW Atlanta, GA 30303-3140	02/20/2018 Expenditure		Telephone Services	\$0.00	\$235.00
Cricket Wireless 21 Peachtree St SW Atlanta, GA 30303-3140	03/21/2018 Expenditure		Telephone Services	\$0.00	\$235.00

Atlanta, GA 30307-2758 OLG Southern Cuisine 177 Peters St SW Atlanta, GA 30313-1319	02/26/2018 Expenditure	Meetings/Events - Food/Beverage	\$0.00	\$1,986.60
Melody Oliphant 8345 Jacobs Ridge Ln Cumming, GA 30028-5008	03/31/2018 Expenditure Fundraiser	Payroll Salaries	\$0.00	\$2,261.47
Organizer 1118 Howard St San Francisco, CA 94103-3946	02/05/2018 Expenditure	Database Subscription	\$0.00	\$2,500.00
Organizer 1118 Howard St San Francisco, CA 94103-3946	03/02/2018 Expenditure	Database Subscription	\$0.00	\$2,500.00
Jovan Paige 4843 Bald Eagle Lithonia, GA 30038-3546	02/28/2018 Expenditure Finance Assistant	Payroll Salaries	\$0.00	\$2,393.70
Jovan Paige 4843 Bald Eagle Lithonia, GA 30038-3546	03/31/2018 Expenditure Finance Assistant	Payroll Salaries	\$0.00	\$2,393.70
Paragon Alarm Systems 7869 Old Morrow Rd Jonesboro, GA 30236-2444	03/02/2018 Expenditure	Security Services	\$0.00	\$75.00
Paragon Alarm Systems 7869 Old Morrow Rd Jonesboro, GA 30236-2444	03/26/2018 Expenditure	Security Services	\$0.00	\$154.34
Paychex 2970 Clairmont Rd NE Brookhaven, GA 30329-4420	02/01/2018 Expenditure	Payroll Fees	\$0.00	\$549.24
Paychex 2970 Clairmont Rd NE Brookhaven, GA 30329-4420	02/28/2018 Expenditure	Payroll Taxes	\$0.00	\$31,642.01
Paychex 2970 Clairmont Rd NE Brookhaven, GA 30329-4420	03/01/2018 Expenditure	Payroll Fees	\$0.00	\$239.68
Paychex 2970 Clairmont Rd NE Brookhaven, GA 30329-4420	03/30/2018 Expenditure	Payroll Fees	\$0.00	\$237.12
Paychex 2970 Clairmont Rd NE Brookhaven, GA 30329-4420	03/30/2018 Expenditure	Payroll Taxes	\$0.00	\$25,290.54
POLIOPS, LLC PO Box 1572 Glen Allen, VA 23060-1572	02/05/2018 Expenditure	Financial Services	\$0.00	\$3,000.00
Publix 595 Piedmont Ave NE Atlanta, GA 30308-2478	02/12/2018 Expenditure	Event Supplies	\$0.00	\$67.71
Publix 1270 Caroline St NE Atlanta, GA 30307-2758	03/05/2018 Expenditure	Event Supplies	\$0.00	\$220.67
Matthew Reed 85 Dayton Way Covington, GA 30016-6693	02/28/2018 Expenditure Finance Assistant	Payroll Salaries	\$0.00	\$1,236.95
Matthew Reed 85 Dayton Way Covington, GA 30016-6693	03/31/2018 Expenditure Finance Assistant	Payroll Salaries	\$0.00	\$2,352.20
Ashley Robinson 880 Glenwood Ave SE Atlanta, GA 30316-1956	02/05/2018 Expenditure Political Assistant	Reimbursement - Mileage	\$0.00	\$90.90
Ashley Robinson 880 Glenwood Ave SE Atlanta, GA 30316-1956	03/31/2018 Expenditure Political Assistant	Payroll Salaries	\$0.00	\$1,721.96
Christopher Smith 2110 Elliston Pl Nashville, TN 37203-5476	02/28/2018 Expenditure Deputy Campaign Manager	Payroll Salaries	\$0.00	\$4,656.02
Christopher Smith 2110 Elliston Pl Nashville, TN 37203-5476	03/31/2018 Expenditure Deputy Campaign Manager	Payroll Salaries	\$0.00	\$4,656.04
Southwest Airlines 2702 Love Field Dr Dallas, TX 75235-1908	02/12/2018 Expenditure	Travel - Airfare	\$0.00	\$691.96
Southwest Airlines 2702 Love Field Dr	03/02/2018 Expenditure	Travel - Airfare	\$0.00	\$269.00

EXHIBIT G

**GEORGIA GOVERNMENT TRANSPARENCY
AND CAMPAIGN FINANCE COMMISSION**

Formerly known as the State Ethics Commission

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Affidavits](#)[Lobbyist Reports](#)[Late/Non-Filer Reports](#)[Vendor Gifts Reports](#)[CFC Main Search](#)[CFC Home Page](#)**CAMPAIGN REPORTS AND REGISTRATION INFORMATION****Committee Name:** BLUE Institute Enterprises, Inc.

Committee Type	View Reports and Registration Information
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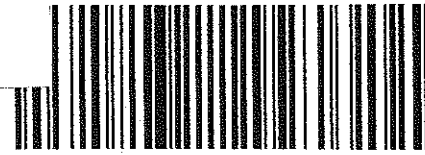
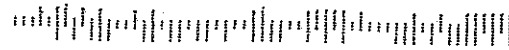
[Campaign Disclosure Reports](#) [Registration Information](#)

Campaign Contribution Disclosure Report(s) for NC2018000007:

No Reports Filed.

Mr. Charles T. Wingo
6125 Rivercliff Dr.
Sandy Springs, GA 3

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West Tower
Atlanta, GA 30334